

Rebekah Schultheiss (Millard)  
rebekah@millardoffices.com  
OSB #121199  
PO Box 7582  
Springfield, OR 97475  
t: 707.227.2401  
*Counsel for Plaintiff*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PENDLETON DIVISION**

**JESSICA BATES,**

Plaintiff,

v.

**FARIBORZ PAKSERESHT, *et al.*,**

Defendants.

Case No.: 2:23-cv-00474-AN

**JESSICA BATES'  
DECLARATION IN SUPPORT  
OF PLAINTIFF'S MOTION FOR  
PRELIMINARY INJUNCTION**

I, Jessica Bates, under penalty of perjury, declare as follows:

1. I am a 41-year-old resident of Malheur County, Oregon, and have personal knowledge of the information below.

Background

2. I am a Christian.

3. My faith is a core part of whom I am, and I regularly attend a nondenominational church with my family.

4. My faith permeates my life.

5. I always strive to conform my behavior to my religious beliefs, and I will not say or do anything that contradicts my Christian faith.

6. My faith informs how I raise my family.

7. I am a single mother of five children ages 10 through 17, and I seek to pass on my faith and beliefs to my children.

8. My faith inspires me in my vocation.

9. I work part-time as an ultrasound technician, and I volunteer twice a month at a faith-based pregnancy center that helps expectant mothers.

10. My faith has anchored me throughout my life.

11. My late husband, David, died in a car crash on January 9, 2017.

12. Life after David's passing has been difficult. But as a Christian, my faith has sustained me, and I continue to find strength and hope in God.

13. Life after David's passing has also been joyful. After David's death, my family, friends, church community, and work colleagues came together to support me, offering me donations, food, help driving my kids to and from sports, and reassuring me of God's provision.

14. Through everything, I remain thankful for the many blessings in my life, and my faith in God remains at the center of everything I do.

#### My desire to adopt

15. On my way to work one day, I heard a Christian radio broadcast about a man who had adopted a child from foster care.

16. I felt God was speaking to me through the broadcast, saying "those are my children."

17. I felt convicted and could not shake the feeling that I was supposed to help these children who were in need.

18. Adoption has special meaning to me and my family because God promises to be a father to the fatherless and a protector of widows. Psalm 68:5.

19. As a Christian too, I believe that those who receive the Holy Spirit and profess their belief in His Son become God's adopted children and fellow heirs to His Kingdom. Romans 8:12–17; Galatians 3:26–29; 4:4–7.

20. Reflecting on the Christian call to care for orphans (Isaiah 1:17), I feel called to open my home to children in need and to replicate what God has done for me and my family.

21. I hope to adopt a sibling pair who are younger than ten years old, because my youngest biological child is currently ten.

22. I hope my older children can also act as role models to the children we adopt and that by adopting siblings each adopted child will be less likely to feel alone or isolated.

23. I am open to receiving any child regardless of the child's race, nationality, ethnicity, cultural identity, spiritual beliefs, or sexual orientation, gender identity, or gender expression.

#### My application to the Oregon Department of Human Services

24. After looking at other options, I decided to apply for an adoption through Oregon's Department of Human Services, or ODHS.

25. ODHS is more economical than a private agency because it is run by the state and doesn't charge a fee.

26. Private agencies, by contrast, typically charge fees in the thousands, and sometimes tens of thousands of dollars.<sup>1</sup>

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<sup>1</sup> <https://perma.cc/3DQR-UHWR> (\$2,000 to \$3,000 Home Study fee), <https://perma.cc/8T5G-7FY3> (\$4,400+ fees for foster care adoption and tens of thousands of fees for other adoption programs.)

27. Additionally, the ODHS office located in Ontario, Oregon, is the only adoption agency in Oregon in close proximity to me.

28. I live in Malheur County, which is in a rural part of east Oregon. According to the ODHS website, the nearest state-contracted adoption agency is over six hours away by car.<sup>2</sup>

29. I started the adoption process in the spring of 2022.

30. My first point of contact was Rebecca Garrison, who supervises the certification process at the Ontario ODHS office.

31. Ms. Garrison put me in touch with Cecilia Garcia—the certifier assigned to my application.

32. Ms. Garcia sent me some preliminary orientation materials and directed me to register for the state’s Resource and Adoptive Family Training course (RAFT).

33. After I completed the orientation materials and registered for the training, I was able to submit an application for a “Home Study.”

34. I understand that Oregon regulations define the Home Study as a document certifying that an applicant is approved by ODHS to care for children in state custody, and I understand that it is a prerequisite to adopting a child from foster care. *See* Compl. ¶¶ 52–55 (Doc. 1).

35. The Home Study process involves several steps, including interviews, home inspections (what we usually call the “home study”), and background checks.

36. I was satisfactorily progressing through the Home Study process when I realized that my faith conflicted with some of the Department’s expectations for adoptive parents.

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<sup>2</sup> <https://perma.cc/6AKM-N59T>.

Oregon's policy on sexual orientation, gender identity, and gender expression

37. During the RAFT training, our instructor heavily emphasized the Department's expectations for how parents should support the sexual and gender identities of children.

38. Under Oregon regulations, parents "must respect, accept, and support" a child's sexual orientation, gender identity, or gender expression. OAR § 413-200-0308(2)(k).

39. Our instructor explained that this meant that adoptive and resource parents must affirm a child's sexual or gender identity.

40. For example, the instructor explained that caregivers must use a child's preferred pronouns, allow a child to dress and express themselves in accordance with their gender identity, and take the child to affirming events like Pride parades.

41. The Department's training materials provided more instruction on what the state expected of us.

42. I've attached some RAFT training materials that the Department provided electronically to trainees last year as exhibit 3 in the Appendix. I can attest that the document on pages 29–43 of the appendix, titled "Supporting LGBTQ+ Youth: A Guide for Foster Parents," is a true and correct copy of a document I received during my training. I can attest that the remaining materials on pages 10–28, and 44–46, promote messages and has language that are similar to the materials I received during my training.<sup>3</sup>

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<sup>3</sup> These materials can be accessed here:  
<https://web.archive.org/web/20221109205456/https://www.oregon.gov/dhs/CHILDR/EN/FOSTERPARENT/Documents/RAFT-Participant-Guide.pdf>.

43. The “Supporting LGBTQ+ Youth” document includes a pronoun chart. It notes that there “are an infinite number of pronouns as new ones emerge in our language”:

Subjective	Objective	Possessive	Reflexive	Example
She	Her	Hers	Herself	She is speaking. I listened to her. The backpack is hers.
He	Him	His	Himself	He is speaking. I listened to him. The backpack is his.
They	Them	Theirs	Themselves	They are speaking. I listened to them. The backpack is theirs.
Ze	Hir/Zir	Hirs/Zirs	Hirself/ Zirself	Ze is speaking. I listened to hir. The backpack is zirs.

Please note that these are not the only pronouns. There are an infinite number of pronouns as new ones emerge in our language. Always ask someone for their pronouns.

transstudent.tumblr.com  
facebook.com/transstudent  
twitter.com/transstudent

Design by Landyn Pan

For more information,  
go to [transstudent.org/graphics](https://transstudent.org/graphics)

**TSER**  
Trans Student Educational Resources

App. 36.

44. The same document above directs prospective parents to support a child’s “self-expression through their choices of clothing, jewelry, hairstyle, friends, and room decoration.” App. 35.

45. The same document above suggests that prospective parents should display “‘hate-free zone’ signs or symbols indicating an LGBTQ-affirming environment (e.g. pink triangle, rainbow, or ally flag),” “whether or not a youth in your care openly identifies as LGBTQ+.” App. 34.

46. The same document above directs caregivers to “[c]elebrate diversity in all forms. Provide access to a variety of books, movies, and materials, including those that positively represent same-gender relationships.” App. 35

47. The same document above states that “[r]especting [a child’s] gender identity and expression is very important,” and parents should avoid “forcing youth to attend activities (including religious activities ...) that are ... unsupportive of people with diverse SOGIE.” App. 34.<sup>4</sup>

My religious beliefs

48. I believe that the Bible provides the truth about the human condition.

49. Specifically, I believe that the Bible accurately describes the differences between men and women.

50. I believe that every human being is made in the image and likeness of God, that God created humans as male and female, and there is a unity between our souls and our bodies on earth. Genesis 1:26–27.

51. I believe that men and women are inherently equal in worth but also different because a person’s God-given sex has spiritual significance for who they are and how they should act. Genesis 1:27, 2:18–24.

52. Because a person’s sex is fixed at the moment of conception, and because I believe that our souls are united with our physical bodies, I believe that a person cannot choose his or her gender.

53. I believe that humans do not have the authority or the power to “transition” from one gender to another (or to a non-binary gender).

54. I also believe that a person should not seek to change their sex or engage in any behavior or speech to suggest a male can be a female, or vice-versa.

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<sup>4</sup> SOGIE meaning Sexual Orientation, Gender Identity and Expression.

55. I do not believe there is “one way” to be a man, or “one way” to be a woman. I believe that boys should not be confined to stereotypically masculine behavior, and I believe that girls should not be confined to stereotypically feminine behavior.

56. Though children should be free to be themselves, I do not believe that stereotypically feminine behavior can make a male a “girl,” anymore than stereotypically masculine behavior can make a female a “boy.”

57. My beliefs about the differences between men and women accord with my church’s teachings.

58. My children and I regularly attend Vale Christian Church, a nondenominational church that embraces biblical teachings on our sexual identity.

59. My pastor has preached about these topics, including on the spiritual significance of our biological sex, how men and women should seek to live in accordance with our God-given biological sex, and how Christians must avoid societal pressures to compromise on our beliefs about our human identity.

60. Vale Christian Church’s statement of faith accords with my beliefs about our embodied existence as men and women in God’s image. It states that:

WE believe that God created all human beings in His image. Therefore, I believe that human life is sacred from conception to its natural end; that we must honor the physical and spiritual needs of all people; following Christ’s example, I believe that every person should be treated with love, dignity, and respect. (Psalm 139:13; Isaiah 49:1; Jeremiah 1:5; Matthew 22:37-39; Romans 12:20-21; Galatians 6:10)

61. People of many faiths, including Muslims, Jews, and Catholics, share my beliefs about our human identity and about how our biological sex has spiritual significance for who we are and how we should act.



62. For example, the Archdiocese of Portland recently published a document titled “A Catholic Response to Gender Identity Theory.”<sup>5</sup>

63. I’ve attached a true and correct copy of the Archdiocese’s document as exhibit 4 in the Appendix.

64. In these guidelines, the Archdiocese affirms that “human beings are made in the image and likeness of God (Gen. 1:27),” that “every human being is a unity of body and soul,” and that “sexual difference has profound significance for our earthly life.” App. 50–51.

65. It goes on to say that “Catholic institutions and programs should not endorse gender identity theory nor enable any form of gender transition, whether social or medical. This means that names, pronouns, facilities use, attire, and sports participation should depend upon biological sex identity, rather than self-perceived gender identity.” App. 57.

66. My beliefs about the institution of marriage reflect my beliefs about the inherent differences between men and women.

67. I believe that marriage is the life-long union of one man and one woman meant to symbolize and point people to God’s everlasting covenant with His bride, the Church. Ephesians 5:31–32.

68. I believe that men and women have different and complementary roles within a marriage, that this complementary nature allows one man and one woman to come together as “one,” and that sexual relations are only appropriate within the confines of a biblical marriage. Genesis 2:24.

69. Vale Christian Church’s teachings accord with my beliefs about marriage and our human identity. My pastors have preached on how our sexual differences inform our marriages, how marriage is the union of one man and one

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<sup>5</sup> <https://perma.cc/K44F-Y458>.

woman, and that sexual acts should only occur within the confines of a biblical marriage.

70. Vale Christian Church's statement of faith also states that:

WE believe God's design for sexual intimacy is to be expressed only within the context of marriage. God instituted marriage between one man and one woman as the foundation of the family and the basic structure of human society. For this reason, I believe that marriage is exclusively the union of one man and one woman. (Genesis 2:24; Matthew 19:5-6; Mark 10:6-9; Romans 1:26-27; 1 Corinthians 6:9)

71. My beliefs about biblical marriage and biological sex inform how I raise my children.

72. I believe I have a religious obligation to share my religious convictions with my family.

73. The Bible instructs Christians to share the gospel with others, Matthew 28:19, including by raising up children in the faith and teaching them truths consistent with the faith, Ephesians 6:4.

74. I seek to fulfill this command in several ways.

75. I seek to bring my children to church with me every Sunday.

76. I also sometimes bring my older children with me to Bible studies on Thursday evenings at church.

77. My oldest four children attend youth group on Wednesday evenings.

78. And my oldest two boys attend a monthly men's breakfast at the church.

79. I also seek to teach my children about our faith at home.

80. We usually read a section of scripture or a devotional most evenings and have prayer time.

81. Sometimes we just talk about the gospel, about where God is leading us in our lives, and about the struggles and triumphs in our vocations.

82. I seek to develop my children's spiritual lives in other ways as well.

83. For example, I volunteer twice a month, or sometimes more, at the Hope Pregnancy Center in Ontario, Oregon, where I help perform ultrasounds for expectant mothers.

84. The pregnancy center is a faith-based organization, and my kids frequently pray for the women we serve.

85. In all of these ways, I seek to share the gospel with my children, including my beliefs about biblical manhood and womanhood and marriage.

86. I do not use coercive tactics on my children (or anyone) when it comes to sharing my faith. *Infra* ¶¶ 145–47.

87. But I always seek to speak the truth and I am religiously obligated to avoid speaking falsehoods or deception of any kind. Exodus 20:16; Ephesians 4:25.

88. And I intend to do all of these things in the future with all of my children, including any children I am lucky enough to adopt.

89. I want to share my religious beliefs, including my beliefs about biblical marriage and our human identity, with my children, whether biological or adopted.

#### How Oregon's policy forces me to violate my beliefs

90. As a matter of faith and conscience, I cannot comply with the Department's requirements set out in OAR § 413-200-0308(2)(k).

91. Because I believe in our embodied existence as males and females, I cannot "support" a child's desire to be live or identify as a gender identity that is not aligned with the child's biological sex.

92. This means I cannot affirm that a male can be a girl, or that a female can be a boy.

93. I cannot use a child's preferred pronouns if the pronouns conflict or obscure the child's biological sex.

94. I believe that using preferred pronouns or otherwise affirming a child's transgender identity would contravene the truth about our embodied existence.

95. And because my faith compels me to speak the truth, and I am therefore religiously obligated to avoid using preferred pronouns as a term of address or otherwise affirming that a child can identify as a gender that is anything other than the child's biological sex.

96. Because I believe humans are made in the image of God, I also cannot "support" a child's desire to live or identify with anything that is not aligned with a binary male/female human identity.

97. I understand that some people identify as "xenogenders" that do not align with the male/female duality.

98. And I understand that some people use pronouns such as neopronouns that do not align with the male/female duality.

99. A New York Times article on this subject describes neopronouns as pronouns that derive from objects and ideas "without expressing gender." So they "can refer to animals," or "to fantasy characters," "or even just common slang."<sup>6</sup>

100. The article contains illustrative examples of pronouns from the writer and from online sources, like vamp (vampire), necro (necromancer), and wit (witch).

101. I cannot affirm that a child can be anything other than a human male or human female.

102. I cannot use a child's preferred pronouns that conflict with or obscure the child's human identity.

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<sup>6</sup> Ezra Marcus, *A Guide to Neopronouns*, NYTimes (Sept. 18, 2022) <https://www.nytimes.com/2021/04/08/style/neopronouns-nonbinary-explainer.html> [pdf: <https://perma.cc/4ARL-9LS8>].

103. Nor can I use pronouns that rebel against our earthly design in God's likeness.

104. I view the neopronouns described above as sacrilegious because they conflict with my belief that we are made in the image of God, and therefore I would feel religiously obligated to avoid using them.

105. My religious objection to using preferred pronouns are widely held by Christians.

106. According to John Piper, a well-known pastor and Baptist theologian, the Christian duty to speak the truth requires that we avoid using preferred pronouns that contradict a person's biological sex.<sup>7</sup>

107. I've attached a true and correct copy Piper's transcribed statement titled "He or She? How Should I Refer to Transgender Friends?" posted on the website of [desiringgod.com](http://desiringgod.com), as exhibit 5 in the Appendix.

108. According to Piper, "manhood and womanhood are glorious, personal realities that transcend genetics and biology, but are never intended to be severed from biology." App. 68.

109. According to Andrew T. Walker, an associate professor of Christian ethics at The Southern Baptist Theological Seminary, Christians should avoid using a person's preferred pronouns, particularly in a public setting.<sup>8</sup>

110. I've attached a true and correct copy of Walker's article titled "He, She, Ze, Zir? Navigating Pronouns While Loving Your Transgender Neighbor," as exhibit 6 in the Appendix.

111. According to Walker, the transgender debate is, at its a root, "a metaphysical debate about ... reality," and Christians must obey their conscience at all costs. App. 75.

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<sup>7</sup> <https://perma.cc/UB2F-EESZ>.

<sup>8</sup> <https://perma.cc/2WBS-PYD5>.

112. As an example, Walker encourages Christians in the workplace to obey their conscience and embrace the “cost” of discipleship when employers require employees to “sign statements ... signaling their agreement with a company’s diversity compliance standards, which may include invasive policies related to transgenderism, such as pronouns.” App. 79

113. I agree with Walker and Piper that “a Christian ought always speak truthfully,” App. 80, and this precludes me from using preferred pronouns or terms of address that obscure or contradict biological reality.

114. Because of my religious beliefs about our embodied existence as males and females, and because of my beliefs about biblical marriage and sexual relations, I also cannot affirm or promote “LGBTQ-affirming” messages that the state expects of caregivers.

115. I cannot support a child’s desire to dress or otherwise express themselves as the opposite sex.

116. I cannot display flags, messages, or other “LGBTQ-affirming” messages like a “pink triangle” or a rainbow flag. *See* App. 34.

117. I cannot take or permit my children to attend “LGBTQ-affirming” events or activities like Pride parades.

118. Based on photographs and descriptions I’ve seen, I understand that gay-pride parades promote a message about sexual ethics and our human identity that contradicts my beliefs that humans should live in accordance with their God-given biological sex and that sexual behavior should only occur within the confines of a biblical marriage.<sup>9</sup>

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<sup>9</sup> *E.g.*, <https://perma.cc/U3B4-YWUH>.

119. For these reasons, I cannot attend or participate in—or facilitate my children’s attendance or participation in or exposure to—“LGBTQ-affirming” activities like gay-pride parades.

120. I also cannot agree to refrain from certain behavior that I am religiously motivated to engage in.

121. For example, the RAFT training materials instruct caregivers to avoid bringing children to religious activities that are unsupportive of people with diverse sexual orientations and gender identities. *Supra* ¶ 47.

122. So presumably this means caregivers should avoid taking their adopted children to a church like Vale Christian Church, where the pastor teaches about biblical manhood and womanhood and where we believe that biblical marriage is the union of one man and one woman.

123. Presumably, caregivers must avoid reading the gospel or sharing their biblical beliefs with their children, because Scripture contains passages saying God created marriage to only be between a man and a woman and sexual activities should only occur within the confines of a biblical marriage.

124. But I will not stop attending church or Bible studies with my children.

125. I will not stop conducting Bible studies, reading devotionals, or praying at home with my family.

126. I will not stop teaching and sharing the Gospel with my children.

127. I will not stop praying with my children for expectant mothers at the Hope Pregnancy Center.

128. And I intend to do all of these things with all of my children so as not to leave anyone out.

129. If I was required to refrain from bringing my adopted children to church, including them in Bible studies, or praying with them, it would also deter

me from doing these things with my biological children. I desire to do things as a family with all my children to avoid making anyone feel excluded.

130. The Bible instructs Christians to diligently teach God's commandments to children, Deuteronomy 6:7, and to "train up a child in the way he should go," Proverbs 22:6.

131. According to John Piper, raising up children includes shaping their sexuality both by instruction and by modeling healthy behavior.<sup>10</sup>

132. I've attached a true and correct copy Piper's transcribed statement on "The Parent's Role in a Child's Gender Development" posted on the website of [desiringgod.com](http://desiringgod.com), as exhibit 7 in the Appendix.

133. In the statement, Piper rhetorically asks Christian parents: "Are you explaining to your kids male and female as Jesus meant it? Are you explaining one flesh in husband and wife? Are you explaining leaving and cleaving? Are you explaining 'let them not separate'? Are you putting all these things into their hearts?"

134. Jared Kennedy, a pastor and writer, wrote a book titled "Teaching Your Children About Gender."<sup>11</sup> I've attached a true and correct copy Kennedy's book as exhibit 8 in the Appendix.

135. In the book, Kennedy writes that parents must help children celebrate their God-given sex and teach them about what their gender means for living fulfilling and biblically centered lives. "They need for us to celebrate the people God has created them to be as gendered persons. Celebrating our kids will give them confidence in God's design." App. 105.

136. According to Kennedy, this means teaching boys to provide for their family, to use their strength to help others, and to take the initiative to serve

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<sup>10</sup> <https://perma.cc/62QT-55FA>.

<sup>11</sup> <https://perma.cc/3TDX-4PCD>.



sacrificially. For girls, this means teaching them to use their influence to help others and to be mindful of their unique ability to nurture and empower others.

App. 108–11

137. Kennedy also instructs parents to avoid rigid stereotypes because a child should be affirmed in their gender, regardless of whether their interests are stereotypically masculine or feminine. App 116–17.

138. I similarly want to instruct my children about biblical manhood and womanhood and the significance of our sexual differences.

139. I cannot say or do anything that goes against my Christian beliefs, and I will not agree to refrain from teaching my children about the faith.

140. Still, I will gladly love and accept any child for who they are, regardless of their sexual or gender identity.

141. I will seek to include my children in all aspects of my life, no matter their sexual or gender identity.

142. I will tell all of my children that they are made in the image of God, that they have the dignity of a human person, and are worthy of equal respect and love, no matter their sexual or gender identity.

143. I will be by my children's side and support them no matter what they are going through and no matter how they identify.

144. If one of my children tells me that they are gay, or that they are struggling with gender dysphoria, or that they identify as transgender, I will listen to them, share my heart with them, and most of all love them and encourage them that I will continue to be there for them no matter what.

145. I will never seek to force my beliefs or my religion onto my children.

146. Rather, I seek to model my Christian faith by example—sharing the gospel by word and deed so that my children may desire what is right and true of their own accord.

147. I desire for all of my children to be able to share anything with me, confident that I will never reject them because of how they identify or because they express beliefs or values that are different than mine.

148. I would never vilify or denigrate one of my children for any reason.

149. I would care for the children placed in my home with all my heart, no matter what.

Why ODHS denied my application

150. After I completed the RAFT classes, I sent an email to Ms. Garcia on August 9, 2022, about the conflict between § 413-200-0308(2)(k) and my religious beliefs.

151. I've attached a true and correct copy of the August 9 email as exhibit 1 in the Appendix.

152. In the August 9 email, I explained that I would gladly love and accept any child, but I could not use preferred pronouns or otherwise encourage or support behavior related to a child's sexual or gender identity that went against my Christian faith.

153. I thought that my concerns might be a nonissue, since I was (at that time) interested in adopting a sibling pair under the age of nine. Since the vast majority of children do not express an LGBT identity, the share of children under the age of nine who express such an identity must be even smaller. Newborns and infants are not even capable of understanding what sexual orientation or gender identity are.

154. Over a month later, on September 22, Ms. Garcia called me to explain that I was ineligible to adopt because of my religious beliefs.

155. Specifically, Ms. Garcia explained that because of my objections to affirming a child's transgender identity, I could not comply with DHS regulations.

156. To illustrate the point, Ms. Garcia asked how I would respond if the Department hypothetically asked me to take a child to receive hormone shots as part of a child's "gender transition."

157. I told her that I would not take a child to receive hormone shots and I thought that it was child abuse to administer these types of pharmaceutical interventions to a young child who was, as I understood in the context of that conversation, under the age of nine.

158. Ms. Garcia explained that my stance did not comply with the RAFT training or with ODHS regulations and I was therefore disqualified from proceeding with the Home Study.

159. I was dumbfounded and told Ms. Garcia that it felt as though I was being denied because of my religious beliefs.

160. Ms. Garcia responded that I could not comply with the state's regulations.

161. Ms. Garcia also said that if I changed my mind in the future—referring to my willingness to affirm a child's LGBT identity—ODHS could move forward on my application.

162. I asked Ms. Garcia if there were other options available, like finding a sibling pair under the age of nine where neither child struggled with gender dysphoria or expressed a transgender identity.

163. Ms. Garcia explained this was not an option because a child might express gender dysphoria later in life and the state needed assurance that I would support and affirm that child's gender identity.

164. It took more than a month before I received the official denial letter.

165. On November 22, Ms. Garcia emailed me the official denial letter, which explained that ODHS was denying my application for failure to comply with the Department's policy on affirming sexual and gender identities.

166. I've attached a true and correct copy of the denial letter as exhibit 2 in the Appendix.

167. After receiving the denial letter, I felt both sad and angry.

168. I felt sad that Oregon disfavors people of faith and believes that they are unfit to parent a child.

169. And I felt angry for the children in Oregon's system. By discriminating against people of faith, Oregon is taking away loving homes that can help to care for children in need.

**DECLARATION UNDER PENALTY OF PERJURY**

I, Jessica Bates, a citizen of the United States and a resident of the State of Oregon, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge.

Executed this 18 day of April, 2023, at Vale, Oregon.

\_\_\_\_\_

**CERTIFICATE OF SERVICE**

I hereby certificate that on April 18, 2023, I filed a true and accurate copy of the foregoing document with the Clerk of Court using the CM/ECF system, and will serve the same on the following parties via email:

Deanna Chang  
Deanna.J.Chang@doj.state.or.us  
t: 503.949.1546  
Sara Van Loh  
sara.vanloh@doj.state.or.us  
t: 503.881.9008  
Oregon Department of Justice  
100 SW Market St,  
Portland, OR 97201

Dated: April 18, 2023

*s/ Johannes Widmalm-Delphonse*

Counsel for Plaintiff